

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CLOUD9 TECHNOLOGIES LLC,

Plaintiff,

Civil Action No. \_\_\_\_\_

v.

**JURY TRIAL DEMANDED**

IPC SYSTEMS, INC. and  
IPC NETWORK SERVICES, INC.,

Defendants.

**CLOUD9 TECHNOLOGIES LLC'S  
MOTION TO SEAL COMPLAINT**

Cloud9 Technologies LLC ("Cloud9") hereby moves this Court, pursuant to D. Del. Local Rule 26.2, for an Order authorizing it to file its Complaint ("Complaint") under seal. As grounds for this Motion, Cloud9 states as follows:

1. The Complaint references and reflects the confidential business information of Plaintiff.
2. Accordingly, good cause exists to protect the interests of the parties against the public dissemination of the confidential information attached within the Complaint, and Plaintiff requests permission to file the Complaint, which includes Exhibits 1-25, under seal. In this regard, the attached proposed order contemplates that Plaintiff will file a public version of the Complaint within fourteen (14) days of serving the above-named Defendants to allow for redaction of confidential information.
3. WHEREFORE, Plaintiff respectfully requests that the Court permit Plaintiff to file the Complaint and related documents under seal.

Dated: December 21, 2018

/s/ Kenneth L. Dorsney

Kenneth L. Dorsney (I.D. #3726)

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**ORDER**

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Having considered **PLAINTIFF'S *EX PARTE* MOTION TO SEAL COMPLAINT**.

**IT IS HEREBY ORDERED** this \_\_\_\_ day of \_\_\_\_\_, 2018 that the Motion is **GRANTED**, and the Complaint in this matter is deemed sealed. Plaintiff shall file a public version of the Complaint within fourteen (14) days of serving the Defendant with the Complaint.

\_\_\_\_\_  
U.S. District Court Judge